

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DANIEL ANDERSEN,)	
)	
Plaintiff,)	16 CV 1963
)	
v.)	Honorable Virginia M. Kendall
)	
CITY OF CHICAGO, et al.)	
)	
Defendants.)	

**JOINT MOTION FOR ENTRY OF JUDGMENT AS TO FEES AND FOR DISMISSAL
WITH PREJUDICE OF PLAINTIFF'S FIRST AMENDED COMPLAINT**

NOW COME the Parties, Plaintiff, DANIEL ANDERSEN, by and through his counsel, LOEVY & LOEVY, Defendant Chicago Police Officers, RICHARD BEDRAN, JAMES HIGGINS, and JOHN OLSON, (collectively "Defendant Officers"), by and through their counsel, BORKAN & SCAHILL LTD., Special Assistant Corporation Counsel, and Defendant CITY OF CHICAGO, by and through its counsel, CELIA MEZA, Corporation Counsel for the City of Chicago, (collectively, "the Parties") and hereby submit this Joint Motion for Entry of Judgment As To Fees and Dismissal With Prejudice of Plaintiff's First Amended Complaint. In support of this Motion, the Parties state as follows:

1. On June 9, 2021, this Court entered judgment on the jury's verdict in favor of Plaintiff and against Defendant Officers Richard Bedran, James Higgins, John Olson, and the City of Chicago awarding \$7,550,000.00 in compensatory damages and, against James Higgins only, \$10,000.00 in punitive damages. Dckt. No. 890.

2. Pursuant to the Local Rules, the Parties initiated negotiations on Plaintiff's claim of reasonable attorney's fees and costs under 42 U.S.C. § 1988 and 28 U.S.C. § 1920 associated with the trial and Plaintiff's First Amended Complaint, Dckt. 932.

3. With the assistance of the Magistrate Judge, Sunil R. Harjani, the Parties resolved the

case in full. The City agreed to pay, and Plaintiff agreed to accept, \$3,175,000.00 to fully satisfy any and all attorney's fees and costs incurred in this litigation, and in turn, Plaintiff agreed to voluntarily dismiss with prejudice his First Amended Complaint, Dckt. No. 932.

4. Accordingly, the Parties seek entry of judgment in the amount of \$3,175,000.00 for attorney's fees and costs, and an order dismissing with prejudice Plaintiff's First Amended Complaint. This will end the litigation in its entirety.

5. A copy of the proposed Dismissal Order with Prejudice of Plaintiff's First Amended Complaint and judgment reflecting the above is attached hereto.

WHEREFORE, the Parties respectfully seek entry of an order of judgment in the amount \$3,175,000.00 for attorney's fees and costs, and an order dismissing with prejudice Plaintiff's First Amended Complaint.

Respectfully Submitted,

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